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January 2, 2024

Via ECF

Hon. Gregory H. Woods
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

USDC SDNY
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MEMORANDUM ENDORSED

Re: *Miller v. Ladson*, No. 1:23-cv-7912-GHW (S.D.N.Y.)

Dear Judge Woods,

We represent Plaintiff Cheryl Miller in the above-referenced litigation. We jointly write with counsel for Defendant Nathaniel Ladson to request that this litigation be reopened and proceedings stayed for five months until June 3, 2024.

As indicated in counsel for Mr. Ladson's December 5, 2023 letter, the parties at that time had reached a settlement in principle. Dkt. No. 19. In response to that letter, the Court ordered that this action be conditionally discontinued without prejudice and without costs, provided that the parties could within thirty days submit their own Stipulation of Dismissal or seek to reopen the litigation if the settlement was not consummated. Dkt. No. 20. The parties have now entered into a settlement agreement that contemplates Mr. Ladson making a series of payments over the next five months. The parties' agreement also contemplates that, once Mr. Ladson completes those payments, they will submit a proposed consent judgment and permanent injunction to this Court that they would respectfully request that the Court enter to close this case.

Given that the agreement will not be consummated until submission of the proposed consent judgment and permanent injunction and on Mr. Ladson's making the monetary payments referred to above, the parties' respectfully request that the Court reopen this case and stay all proceedings during the five month period during which the payments are to be made.

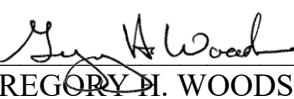
The Court will hold a telephonic conference with respect to this motion on January 5, 2024 at 12:00 p.m. The parties are directed to the Court's Individual Rules of Practice in Civil Cases, which are available on the Court's website. Rule 2 of the Court's Individual Rules contains the dial-in number for the conference and other relevant instructions. The parties are specifically directed to comply with Rule 2(C) of the Court's Individual Rules.

Respectfully Submitted,


Joshua L. Simmons

SO ORDERED.

Dated: January 3, 2024
New York, New York


GREGORY H. WOODS
United States District Judge